

ACI/O-11 051

**Atlas Minerals**  
Division of Atlas Corporation  
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File Atlas  
Mineral's  
Main File  
copy to Ron D.,  
Tom T. Wayne,  
Sue, Tom P.,  
and me

October 28, 1983

**JIM**

NOV 0 8 1983

Mr. James W. Smith, Jr.  
Division of Oil, Gas and Mining  
4241 State Office Building  
Salt Lake City, UT 84114

RE: Reclamation Contract  
Approval Conditions

Dear Mr. Smith:

I am writing in response to your letter dated October 19, 1983, concerning the above referenced conditions. Your request for additional information on three conditions will be addressed by number below:

1. Atlas feels that the procedures previously submitted for sealing portals, shafts and boreholes are adequate for all of our mining operations. Based upon our current understanding of the geology and characteristics of aquifers in the areas around our mining locations, the potential for future surface discharge is not expected to exist. None of the aquifers penetrated by Atlas' existing mines are artesian in nature and they are sufficient in depth below the portal or shaft opening to prevent any discharge at the surface.
- 2.a Please refer to your letter dated January 28, 1983 in which the Divisions conditions for final approval of Atlas's Reclamation Contract were spelled out. All of the information required at this time by condition number two has been provided to the Division. An annual monitoring report on vegetation establishment at the Roosevelt Mine will be submitted in 1984. It is our understanding that meeting the requirements of condition number two is not dependent on the success of vegetation establishment at this mine and therefore, the information previously submitted should be sufficient to allow the Division to finalize the contract approval. However we are confident that vegetation will be successful.

RECEIVED  
NOV 7 1983

DIVISION OF  
OIL, GAS & MINING

**Atlas Minerals**  
**Division of Atlas Corporation**

SHEET 2      DATE 10/28/83

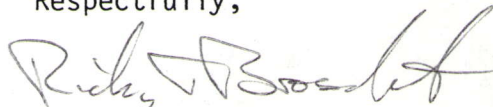
TO James W. Smith, DOGM

- 2.b Once again, please refer to your above referenced letter. The requirements of condition number two did not include an analysis of the spoil material or characterization of the parent material type, and therefore this information has not been obtained. The Roosevelt Mine removed ore from the Saltwash member of the Morrison formation, and any comparisons the Division wishes to make will have to utilize this information in conjunction with table 4.3 on page 35 of the MK Report.
3. As stated in response number one above, Atlas does not believe that a potential exists for surface discharge of underground water at the Wood Mine. In light of this, and a lack of justification from the Division for a contrary opinion, it would seem that the Division's request for flow volumes and water analyses is premature and superfluous. In my letter dated March 30, 1983, all of the information required by condition number three, as requested in your letter dated January 28, 1983, was submitted. In a letter from Mr. Tetting dated June 10, 1983, the Division approved this submittal as satisfying the requirements of condition number three, and therefore Atlas believes it's obligations with respect to this condition have been met.

In summary, Atlas believes it has responded in good faith and in a timely manner, and has submitted all of the information required as conditions for final approval of the Reclamation Contract. It now appears that the Division is prolonging final approval by requesting additional information and thereby extending an already over drawn out process. It would be greatly appreciated if the Division would review the original conditions made for the final approval of this contract, and review Atlas' submittals for those conditions. We trust you will come to the same conclusion that we have, which should lead to the Division issuing final approval for Atlas' Reclamation Contract.

Atlas will be willing to discuss the additional information requested or any additional concerns the Division may have at some later point in time. However, we do not believe the additional information requests are appropriate or justified as a part of the contract approval process. If you have any questions please contact either myself or Richard Blubaugh.

Respectfully,



Ricky J. Broschat  
Environmental Specialist

cc: R. Blubaugh

RJB/jl